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DOCKETS

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U.S. Department of Transportation Dockets
Docket No. FAA-2000-7623 - 23
400 Seventh Street SW, Room Plaza 401
Washington, DC 20590

Dear Sirs:

I am writing to you for reconsideration of the FAA rule (FAR 91.109a) that requires fully functioning dual controls in the aircraft for any dual instruction to be given. The current rule already allows instrument instruction to be given under certain conditions.

I would like the FAA to consider amending this rule to allow **ANY** form of dual instruction (e.g. instrument, flight review, aircraft checkout, etc.) to be given in an aircraft lacking dual controls as long as: the pilot is a Private Pilot (or better), and the instructor is comfortable that the instructional flight can be conducted safely.

My premise is that more instruction is better than less. Also, instruction in type-specific aircraft is better than instruction in just category and class. For example, I believe an amended rule that allowed for any dual to be given in Bonanzas, would further the safety of Bonanza pilots. As the rule currently stands, each Bonanza pilot/owner that only has a single, throwover yoke must either: A) get instruction in some other plane that has dual controls (e.g. a Cessna) or B) go out and buy a dual yoke.

I believe that scenario 'A' is less than optimal from a safety standpoint in that they are not receiving dual in **THEIR** airplane. In scenario 'B' the economic impact of this easily runs into the thousands of dollars per aircraft – which in most cases would preclude the pilot from pursuing this. Any impediment to receiving dual in their aircraft (e.g. requiring an expensive dual yoke, renting a Cessna, etc.) reduces the amount of dual instruction a pilot will seek.

The current rule states that instrument instruction may be given if the pilot is a Private Pilot (or better) and the instructor feels that the flight can be safely conducted. I implore you to consider applying these same criteria to allow **ANY** dual instruction to be given. I certainly understand that the FAA would like fully functional dual controls for any primary instruction. I am not arguing to change that aspect of the rule. But once the pilot is fully qualified to act as PIC in that aircraft, make it easy for them to receive more dual.

I am presently a Commercial Pilot and Certificated Flight Instructor (CFI-IA). I have taught over the years for the American Bonanza Society's Bonanza Pilot Proficiency Program (BPPP). Giving dual instruction to a pilot in their Bonanza is the best education I could give. I know that the BPPP has a waiver from the FAA that allows them to conduct these flight clinics by qualified CFI's in single yoke Bonanzas. I encourage the FAA to extend this from a waiver to a blanket FAR that allows any dual if the flight instructor is comfortable that it can be done safely.

Adopting my proposal to amend FAR 91.109 would have no negative economic impact, but would have a positive safety impact. Since there are thousands of Beechcraft Bonanzas in our general aviation fleet today, adopting an amended rule to increase the ease at which Bonanza pilots/owners can get dual will intrinsically contribute to the training (and therefore safety) of thousands of pilots. Risk management is inherently maintained because the amended FAR would limit the dual to Private Pilot and the instructor would have to feel comfortable that the dual could be safely administered by them.

Thank you for your consideration of my proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Myshatyn". The signature is fluid and cursive, with a long horizontal stroke at the end.

Michael Myshatyn
4708 Chippendale Drive
Ft. Collins, CO 80526